

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)
Plaintiff,)
vs.) 4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al,)
Defendants.)

THE VIDEOTAPED 30(b) (6)

DEPOSITION OF PATRICK PILKINGTON, produced as a
witness on behalf of the Plaintiff in the above
styled and numbered cause, taken on the 20th day of
August, 2007, in the City of Fayetteville, County of
Washington, State of Arkansas, before me, Lisa A.
Steinmeyer, a Certified Shorthand Reporter, duly
certified under and by virtue of the laws of the
State of Oklahoma.

Exhibit 30

TULSA FREELANCE REPORTERS
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1 A No.

2 Q Does Tyson ever pick up dead birds?

3 A From the house?

4 Q At any time --

5 A Well, it's -- I'm sorry. It's the grower's 02:25PM
6 responsibility to remove dead birds or daily
7 mortality from the house.

8 Q Okay. Does Tyson generally set the schedule
9 for placement of the birds with the grower?

10 A Yes. 02:25PM

11 Q Does Tyson generally set the schedule for the
12 pickup of the birds from the grower?

13 A Yes.

14 Q Does Tyson determine the quality of birds to
15 be delivered to a grower? 02:26PM

16 A Tyson -- our intent is to deliver good quality
17 birds to all growers.

18 Q Does Tyson cull any chicks before it delivers
19 any birds to the growers?

20 A That practice is not universal but, yes, in 02:26PM
21 some hatcheries certain chicks that are deemed unfit
22 for placement or for animal welfare purposes, they
23 would be culled, yes.

24 Q Does Tyson supply and deliver all the feed to
25 each farm? 02:26PM

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1 A Yes.

2 Q Does Tyson supply all the medications used on
3 a farm for the birds?

4 A We do supply medication when needed.

5 Q Does Tyson supply all vaccinations to the 02:26PM
6 birds?

7 A We also supply vaccinations when needed.

8 Q Does Tyson supply all the veterinary services
9 used or needed for the birds?

10 A We employ and then provide veterinary services 02:27PM
11 for the growers.

12 Q Does Tyson supply a service tech or
13 representative who makes weekly or more often visits
14 to inspect the operations of its growers?

15 A Our service techs don't really inspect, but we 02:27PM
16 do have service techs that are employed, and they
17 generally have an area in which they will visit
18 farms on roughly a weekly basis.

19 Q You said they don't inspect. Do you mean they
20 don't check the temperature in the barn? 02:27PM

21 A No. What I'm wanting to clarify is that's not
22 -- their job is to advise growers and to make them
23 aware of best management practices and to help them
24 in ways that make sure their flock performs very
25 well. It's not simply an inspection role. 02:28PM

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